

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

JASON WILLIAMS,

Plaintiff,

vs.

AT&T MOBILITY, LLC,

Defendant.

Case No. 5:19-cv-00475-BO

**MOTION FOR EXTENSION OF TIME  
FOR DEFENDANT TO FILE ANSWER  
TO COMPLAINT  
(CONSENT MOTION)**

Defendant AT&T Mobility, LLC (“Defendant”), pursuant to Federal Rule of Civil Procedure 6(b) and Local Civil Rule 6.1, hereby moves this Court to extend its deadline to respond to Plaintiff’s Complaint [Dkt. 2] by seven days, or until April 15, 2020. In support of this motion, Defendant states the following:

1. Defendant filed a pre-answer motion to dismiss.
2. The Court’s Order [Dkt 20] denying Defendant’s Motion was entered March 25, 2020.
3. Pursuant to Fed. R. Civ. P. 12(a)(4)(A), Defendant’s answer is due April 8, 2020.
4. Notwithstanding good faith efforts and due diligence Defendants and their counsel need a short extension of time to prepare and file their answer in part due to prevailing circumstances in this District.
5. The undersigned counsel conferred with counsel for Plaintiff, who consented to the extension requested herein.
6. Good cause exists for this extension, and the extension will not delay

adjudication of the case.

7. A proposed order is submitted with this motion.

WHEREFORE, Defendant respectfully prays that this Court grant its motion and order that the deadline by which Defendant must file its answer to the Complaint be extended to April 15, 2020.

Respectfully submitted this the 2nd day of April, 2020.

KILPATRICK TOWNSEND & STOCKTON LLP

/s/ Jos. Dowdy

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*Counsel for Defendant AT&T Mobility, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on date set out below, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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This the 2<sup>nd</sup> day of April, 2020.

/s/ Jos. Dowdy

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